

Local Emergency Planning Committee

EIS000950

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January 19, 2000

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Wendy R. Dixon, EIS Project Manager
Yucca Mountain Site Characterization Office
Office of Civilian Radioactive Waste Management
U.S. Department of Energy
P.O. Box 30307, Mail Stop 010
North Las Vegas, Nevada 89036-0307

RE: Comment on the Draft Environmental Impact Statement for a Geologic Repository for Spent Nuclear Fuel and High-Level Radioactive Waste at Yucca Mountain (DOE, July 1999)

Dear Ms. Dixon:

1 The Eureka County Local Emergency Planning Committee is deeply concerned that the Draft Environmental Impact Statement (DEIS) lacks information, analysis and mitigation measures regarding emergency response and emergency management as it relates to the transportation of high-level nuclear waste shipments. Most specifically, we are concerned that the DEIS does not address the potential impacts to Eureka County emergency services and emergency management activities due to the proposed Carlin rail corridor alternative.

The Draft EIS does not address the impacts on local governments for emergency management and response activities necessary to deal with potential radiological accidents during transportation. There is not analysis or discussion of the potential activities and costs needed during all phases of emergency management and response including mitigation, preparedness, response and recovery phases.

We believe that emergency management impacts should include the following general items:

- Need for emergency management planning
 - Improvement/revision of the County Emergency Operations Plan
 - Preparation/improvement of local emergency plans
 - Preparation/improvement of evacuation and transportation planning
 - Improvement of resource lists
 - Need for emergency public information and education programs for potentially affected populations
 - Need for cooperative aid agreements
 - Need for contractual agreements for response services
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- Costs for:
- Emergency management planning improvements
- Emergency management program improvements
- Emergency response training and equipment
- Emergency response personnel
- Emergency response actions
- Recovery activities and costs
- Contracted emergency response services (i.e., private emergency response teams)

The description of rail line operations is vague and incomplete; particularly regarding safety and emergency actions necessary for response to accidents. Additionally, the Draft EIS does not address the fact that local emergency resources are scarce in most of the area impacted by the Nevada transportation alternatives, with the possible exception of Clark County. The scarcity of resources may increase the severity of injury and negative impacts of any transportation accidents or incidents.

Since Eureka County is a small rural jurisdiction, we are greatly concerned regarding the increased risks the project presents to our paid law enforcement personnel and volunteer fire and rescue personnel. We do not believe the DEIS adequately addresses the need for and measures necessary to mitigate the impacts that will occur due to the proposed action and more specifically, the Carlin rail alternative.

Sincerely,



Mike Rebaleati, Chairman

cc: Eureka County Board of Commissioners
Leonard Fiorenzi
Abigail C. Johnson